

6/15/2004

Comments by Alex Hildebrand on Volume 2 of the  
Advisory Committee Review Draft of the State Water Plan

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- 1) Comment on the table of Resource Management Strategies, page 5, are the same as comments submitted on the same table in Volume 1 and on the table's alleged yield from CALFED surface storage as previously submitted.
- 2) Page 2 of Agricultural Land Stewardship, Current Initiatives, states "Since government land acquisition programs can only affect a small portion of agricultural land, -----". This clause should be eliminated. It implies that government acquisition of farm land is a preferred option!
- 3) The last sentence of paragraph 1 on page 3 of the stewardship section states "there are programs which limit or cease commercial agricultural use to promote wetlands and other wildlife sensitive areas----- ". This is reallocation of farm land and water use to environmental use and is not an act of Agricultural Land stewardship. This and proposed land fallowing to benefit the environment should be eliminated from this section.
- 4) The section on conjunctive Management and Groundwater Storage is important and discusses both benefits and limitations. However, the use of terminology is confusing. Under Potential Benefits, page 2, it uses CALFED's term "water supply reliability". Neither CALFED nor the Water Plan defines that term. Does "reliable" mean more adequate, or more uniform, or more predictable, or something else?

Under Current Conjunctive Management, page 1, and elsewhere it discusses increased deliveries but does not say to whom water is delivered or whether the increased delivery is an increase in statewide water supply or is in part a reallocation of water used for groundwater fill from one region to another.

These confusions should be clarified.

4) The section on Ecosystem Restoration under Major Issues, page 4, should include a new item entitled “Competition for Ecosystem Water”.

“If the Water Plan does not provide for enough water to meet both ecosystem needs and all human needs, the public support for ecosystem protection will be endangered to the extent that it competes for water that is needed to meet human needs.”

5) The section on floodplain Management in the first paragraph on page 2 discusses studies in the Sacramento River floodplain. A new paragraph should follow that paragraph as follows.

“Peak flood stages can be attenuated, and water quality and environmental benefits achieved in the San Joaquin watershed by restoring natural overflow of flood waters onto existing wildlife refuges and other dedicated wetlands. This concept is under discussion among the Fish and Wildlife Service, State Parks, Grassland Districts, the U.S. Corps of Engineers, the Reclamation Board, the San Joaquin River Flood Control Association, and State and Federal export projects.”

What is now the second paragraph on page 2 in this section refers to restoring “meander belts”. That paragraph should be expanded to say  
“Meander belts along the valley floor of the San Joaquin watershed create problems. They result in loss by erosion of the berms that have oaks and cottonwoods. The greatly altered flow regime of the river can not create similar new berms as the old ones are lost. The eroded trees and material is carried down into the tidal waters of the South Delta. Deposited sediments in South Delta channels have already raised the bottom elevation by as much as eight feet in many miles of channel. This causes problems for flood conveyance and for local diverters of water, makes the water too shallow for good fish habitat, causes problems for navigation, and raises water temperatures”.

6) Add a paragraph after the first paragraph of the section on Recharge Areas Protection as follows.

“The protection of recharge areas is of great importance. However, in order for that protection to result in stored water the Water Plan must assure that an adequate supply of good quality water is available to be applied to the recharge areas. For example, the aquifer in eastern San Joaquin County is seriously overdrafted. The necessary recharge area is available. But the Water Plan does not provide water for recharge”.

7) Under Benefits from Protection of recharge areas on page 2, the two sentence paragraph at the bottom of the page should be replaced as follows.

“Protection of recharge areas assures that groundwater recharge can be achieved to store water that the Water Plan must provide (Water Code 10004.6) to replace groundwater overdraft”.

8) The first bullet on page 3 of that section under Potential Costs should read “the cost, when necessary, to purchase or lease land that is to be used for recharge area”.

9) After the first two paragraphs under Surface Storage - Regional/Local insert the following paragraph.

“Neither in this section nor elsewhere in the Water Plan is there a discussion of new surface storage that many have to be built by the state as part of the means by which an adequate overall water supply is provided as required by water Code 10004.6. There is also no analysis to show that new reservoirs will not be needed”.

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I believe that the discussion of climate change, particularly by M. Roos, in Volume 4 is appropriate. However, it should be stated clearly in Chapter 1 and/or Chapter 2 that although the subject is thoroughly discussed in Chapter 4, the Water Plan does not propose measures that would avoid a reduction in water supply that may result from loss of water storage in the snowpack.